

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Richmond Division

Case No.

3:21cv403

(to be filled in by the Clerk's Office)

Bria Coprew-Paster Burk

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☐ Yes ☐ No

Virginia Commonwealth University employee Amina H. Campbell
 Virginia Commonwealth University employee Danielle Harkston

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

Bria C. Burk
 P.O. Box 4760
 Richmond VA 23220
 City State Zip Code
 757 3740561
 BRIACBURK@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

See attachment

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Ariana H. Campbell (individual)
 Virginia Commonwealth University employee
 828 W Franklin Street
 Richmond VA 23220
 City State Zip Code
 N/A
 804 8281674
 ACAMPBELL@vcu.edu
☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Danielle H. Harston (individual)
 Virginia Commonwealth University employee
 828 W Franklin Street
 Richmond VA 23220
 City State Zip Code
 N/A
 804 8281674
 DNHARSTON@vcu.edu
☐ Individual capacity ☒ Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name _____

Job or Title (if known) _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐ Individual capacity☐ Official capacity

Defendant No. 4

Name _____

Job or Title (if known) _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐ Individual capacity☐ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☐ State or local officials (a § 1983 claim)

N/A Defendant No. 1 & No. 2
are not state/local or
federal officials

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

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- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
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III. Statement of Claim *see attachment*

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

see attachment

- B. What date and approximate time did the events giving rise to your claim(s) occur?

see attachment

- C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)
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Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

N/A

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

See Attachment

I. The Parties to this complaint

A. The Defendants

Defendant No. 1

Alaina H. Campbell

Address

613 N 31st Street Richmond, VA 23223

Phone number

804-615-7524

Defendant No. 2

Danielle Hairston

Address

1321 ½ E. Main Street #304 Richmond, VA 23219

84 Summit View Drive Martinsville, VA 24112

Phone number

804-308-1425/276-352-8610/ 540-819-5896

II. Statement of Claim

A. Violation of the Equal Pay Act and unlawful sex discrimination against Bria Corprew-Royster Burr took place at Virginia Commonwealth University and wrongful termination occurred on June 21, 2019.

B. On June 21, 2019 I, Bria Corprew-Royster Burr, was asked by Alaina H. Campbell through email communication to email address corprewroysb@vcu.edu to meet her and Danielle Hairston in a conference room in the VCU Blanton House at 10:30am. I was told by Alaina H. Campbell that she felt working as an academic advisor was “not a good fit for me” and my “position was being terminated”.

C. On June 21, 2019 Danielle Hairston was in the room where I was directed to go to meet with Alaina H. Campbell at the VCU Blanton House. Danielle Hairston witnessed Alaina H. Campbell presenting me with a letter of termination and then advising me to file for unemployment. I returned to my office after meeting with Danielle Hairston and Alaina H. Campbell at the VCU Blanton House to finish meeting with students with scheduled academic advising appointments through Student Success Collaborative/Navigate. I

emailed the students with scheduled appointments for the day and informed them that I would not be able to meet with them for their advising appointments and recommended they reschedule with another academic advisor in the Biology department. I emailed the VCU ombudsman representative to inform them of the wrongful termination decision made by Alaina H. Campbell.

IV. N/A

V. Relief

1. I want the electronic termination code under my name removed from VCU human resources records and VCU eservices.
2. I want back pay based on the salary I was earning as a Biology Academic Adviser while employed by Virginia Commonwealth University from the date of June 22, 2019-present.
3. Additionally, I am requesting punitive damages in the amount of \$30,000. This amount is due to having to pay for childcare/holding a space on the waitlist while job searching (\$3000) and approximately \$1000 per month that I have had to charge on my credit card for daily living expenses.
4. I want to be reimbursed for attorney fees in the amount of \$140.00 and case filing fees in the amount of \$402.00.
4. I want to be considered for and accept employment (accepting a salary no less than \$68,000) at Virginia Commonwealth University without retaliation, discrimination and/or intimidation from VCU employees. I am seeking these measures of relief as a result of wrongful termination due to discrimination.